

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SAINT-GOBAIN GLASS FRANCE,)	
)	
Plaintiff,)	
)	
v.)	C. A. No. 06-446 (JJF)
)	
AUTOMOTIVE COMPONENTS)	
HOLDINGS, LLC,)	
)	
Defendant.)	

PLAINTIFF'S REPLY TO DEFENDANT'S COUNTERCLAIMS

Plaintiff Saint-Gobain Glass France ("Saint-Gobain") replies to the counterclaims of defendant Automotive Components Holdings, LLC ("ACH") as follows (paragraph numbers correspond to the paragraph numbers of defendant's counterclaims.)

1. Plaintiff admits the allegations of paragraph 1 of defendant's counterclaims.
2. Plaintiff admits the allegations of paragraph 2 of defendant's counterclaims.
3. Plaintiff admits that defendant's counterclaims purport to state a declaratory judgment cause of action, but denies that the '917 and '629 patents are not infringed and are invalid.
4. Plaintiff denies the allegations of paragraph 4 of defendant's counterclaims as to an actual and justiciable controversy with respect to the validity of the '917 and '629 patents.
5. Plaintiff disputes subject matter jurisdiction as to validity and, further, denies that defendant's counterclaims have any merit.

6. Plaintiff disputes subject matter jurisdiction as to validity and, further, denies that defendant's counterclaims have any merit.

7. Plaintiff denies the allegations of paragraph 7 of defendant's counterclaims.

8. Plaintiff denies the allegations of paragraph 8 of defendant's counterclaims.

9. Plaintiff denies the allegations of paragraph 9 of defendant's counterclaims.

10. Plaintiff denies the allegations of paragraph 10 of defendant's counterclaims.

WHEREFORE, plaintiff respectfully requests that judgment be entered against defendant on its counterclaims and that judgment be entered for plaintiff granting the relief requested in its complaint.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Arthur I. Neustadt
Jean-Paul Lavalleye
Aarti Shah
OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.
1940 Duke Street
Alexandria, Virginia 22314
(703) 413-3000

By: /s/ David E. Moore

Richard L. Horwitz (#2246)
David E. Moore (#3983)
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899-0951
Tel: (302) 984-6000
rhorwitz@potteranderson.com
dmoore@potteranderson.com

Dated: October 4, 2006
753885 / 30535

Attorneys for Plaintiff
Saint-Gobain Glass France

IN THE UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on October 4, 2006, the foregoing document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF, which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading:

Collins J. Seitz, Jr.
Kevin F. Brady
Connolly Bove Lodge & Hutz LLP 1007
North Orange Street
P.O. Box 2207
Wilmington, DE 19899

I hereby certify that on October 4, 2006, I have Electronically Mailed the attached document to the following:

Ernie L. Brooks
Frank A. Angileri
Brian S. Tobin
Brooks Kushman P.C.
1000 Town Center
Twenty-Second Floor
Southfield, Michigan 48075
ebrooks@brookskushman.com
bk@brookskushman.com
btobin@brookskushman.com

/s/ David E. Moore
Richard L. Horwitz
David E. Moore
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19899-0951
(302) 984-6000
rhorwitz@potteranderson.com
dmoore@potteranderson.com